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States Government

Department of Energy

Rocky Flats Office

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## ACTION

DIST.	LTR	ENC
BENJAMIN, A.		
BERMAN, H.S.		
BRANCH, D.B.		
BURLINGAME, A.H.		
CARNIVAL, G.J.		
COPP, R.D.		
CROUCHER, D.W.		
DAVIS, J.G.		
EVERED, J.E.	X	X
FERRERA, D.W.		
GOODWIN, R.		
HANNI, B.J.		
HEALY, T.J.		
HILBIG, J.G.		
DEKER, E.H.		
KERSH, J.M.	X	X
KIRBY, W.A.		
KRIEG, D.		
KUESTER, A.W.		
LEE, E.M.		
MAJESTIC, J.R.		
MARX, G.E.		
MORGAN, R.V.		
PIZZUTO, V.M.		
POTTER, G.L.		
SANDLIN, N.B.		
SHEPLER, R.L.		
SULLIVAN, M.T.		
SWANSON, E.R.	X	X
TAYLOR, N.K.G.		
WILKINSON, R.B.	X	X
WILSON, J.M.		
YOUNG, E.R.		
ZANE, J.O.	X	X
289	K	X
Berman, B	X	X

MAY 2-8 1992

EG&G  
ROCKY FLATS PLANT  
CORRESPONDENCE CONTROL

ADMIN RECORD

ERD:BKT:6037

Rocky Flats Plant Environmental Compliance Issue Coordination for NOV No. 92-05-22-01  
from the Colorado Department of HealthRay Greenberg, Chief, D&D Branch, EM-453, HQ  
Kathleen Taimi, Director, Office of Environmental Compliance Division, EH-22, HQ

This memorandum serves to formally notify you that the Colorado Department of Health (CDH) has issued a Notice of Violation (NOV) (No. 92-05-22-01), effective May 22, 1992, to EG&G under the RFP Interagency Agreement (IAG) and the Colorado Hazardous Waste Act (CHWA). Informal notification was provided on May 22 and 26, 1992. The NOV resulted from the transmittal of a deficient Draft Final Phase I RFI/RI Work Plan for OU 8. The root cause of the deficient Draft Work Plan appears to have been insufficient preparation time resulting from contract procurement delays. These delays may have resulted from inadequate planning and/or scheduling. Both the CDH NOV letter, dated May 22, 1992, and the DOE/RFO Work Plan transmittal letter, dated April 30, 1992, are attached.

Per DOE Order 5400.2A, Environmental Compliance Issue Coordination, we have also attached a "Coordination of Significant Environmental Compliance Issue Paper" per Attachment 1 of the Order. The details of the environmental compliance issue are contained in this attachment.

Also attached is a copy of DOE memorandum ERD:BKT:6036 to EG&G requesting that EG&G promptly resolve the issue.

All communication regarding this issue should be directed to either Rich Schassburger, Deputy Director, Environmental Restoration Division, at (303)966-4888 or myself at (303)966-7846 in order to maximize the efficiency in resolving the issue.

*Richard J. Schassburger*  
Frazer R. Lockhart  
Director  
Environmental Restoration Division

CORRES. CONTROL  
TRAFFICReviewed for Addressee  
Corres. Control RFP

5-192

DATE BY

Rc #

Attachments

DOCUMENT CLASSIFICATION  
REVIEW WAIVER PER  
CLASSIFICATION OFFICE

MAY 28 199

cc w/Attachments:

A. Rampertaap, EM-453  
T. Vaeth, OOM, RFO  
J. Hartman, AMEM, RFO  
R. Schassburger, ERD, RFO  
T. Lukow, WMED, RFO  
B. Thatcher, ERD, RFO  
M. Roy, OCC, RFO  
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## COORDINATION OF SIGNIFICANT ENVIRONMENTAL COMPLIANCE ISSUE PAPER

ISSUE: Draft Final Phase I RFI/RI Work Plan for OU 8, RFP, has the following deficiencies:

- 1) IHSS locations inconsistent with IAG and Draft Historical Release Report,
- 2) review and evaluation of existing data are incomplete,
- 3) Field Sampling Plan is not supported by DQOs, and
- 4) sample locations are poorly presented.

Untimely procurement of contract by EG&G to Advanced Sciences, Inc. for preparation of the Phase I RFI/RI Work Plan for OU 8. The chronology of contract procurement for the OU 8 Work Plan was as follows:

10/20/91	Initiate development of Statement of Work (SOW) for Work Plan, EG&G
11/23/91	SOW complete, begin internal review, EG&G
12/9/91	DOE funding notification for FY92
12/19/91	SOW complete, EG&G
1/3/92	Sole source justification form switched from IT Corp. to Advanced Sciences, Inc., EG&G
1/13/92	SOW and purchase requisition submitted to procurement, EG&G
1/29/92	Procurement acknowledged receipt of SOW and purchase requisition, EG&G
2/5/92	Request for Proposal issued, EG&G
2/21/92	Proposal for development of Work Plan completed, Advanced Sciences, Inc.
2/24/92	Initiate technical evaluation of proposal, EG&G
2/28/92	Technical evaluation completed, EG&G
3/31/92	Contract awarded to Advanced Sciences, Inc. for Work Plan development, EG&G

The preliminary Draft Phase I RFI/RI Work Plan for OU 8 was submitted to EG&G on April 21, 1992, by Advanced Sciences, Inc. EG&G submitted the preliminary Draft Work Plan to DOE/RFO for review on April 21, 1992. DOE/RFO reviewed document on April 22 and 23, 1992. DOE/RFO presented comments on the document to EG&G and Advanced Sciences, Inc. on April 23, 1992. EG&G transmitted the Draft Final Work Plan to DOE/RFO on April 28, 1992. The Draft Final Work Plan was transmitted to EPA and CDH on May 1, 1992, the IAG deliverable date for this document. The April 30, 1992 DOE/RFO transmittal letter to EPA and CDH identified deficiencies in the Draft Final Work Plan and proposed a mechanism for correcting the deficiencies.

A deficient draft RFI/RI Work Plan should, without question, be avoided. However, the significance is overstated by CDH since adequate time exists for revisions before the final RFI/RI Work Plan is due on the IAG deliverable date of September 28, 1992. In addition, RFI/RI field work is based on the final, rather than the draft, Work Plan. Thus, while compressing the time available for producing the final Work Plan, the deficiency will not impact RFI/RI field activities and milestones.

The significant issue is the procurement of the contract for preparing the RFI/RI Work Plan. Time required to complete the procurement process was excessive and resulted in approximately three weeks for the preparation of the draft Work Plan.

A less significant, but noteworthy, issue involves the Rocky Flats Environmental Database System (RFEDS). At the April 16, 1992 scoping meeting for OU 8, Advanced Sciences, Inc. stated that the volume of data available from RFEDS which may pertain to OU 8 is approximately 70,000 individual analyte records and that very little of these data have completed the validation process. EG&G stated that a validation of most of the data has been undertaken but unfortunately the validated database and RFEDS cannot be electronically cross-referenced, meaning that confirmation of validated data would have to be performed manually at present. Evaluation of existing data is required by 40CFR Part 300.430 (b) (1) as part of scoping.

#### INITIATING FIELD/PROGRAM ELEMENT:

Source of issue: DOE/RFO

Points of contact: Frazer Lockhart  
Director, Environmental Restoration Division  
(303)966-7846  
  
Rich Schassburger  
Deputy Director, Environmental Restoration Division  
(303)966-4888  
  
Bruce Thatcher  
Physical Scientist, Environmental Restoration Division  
(303)966-3532

' STATUTES:

Colorado Hazardous Waste Act

Part XI, Section D.5, of the RFP Hazardous Waste Permit (91-09-30-01)  
(Part XI, Section D.5, VI. attached)

RFP IAG, Attachment 2 - Statement of Work, Section VI.  
(attached)

REGULATORY AGENCY INVOLVED:

Colorado Department of Health

SUMMARY INFORMATION:

A deficient Draft Final Phase I RFI/RI Work Plan for OU 8 was transmitted to EPA and CDH on May 1, 1992. The deficiencies identified by the Colorado Department of Health included the following:

- 1) IHSS locations and configurations not consistent with Draft Historical Release Report transmitted to EPA and CDH,
- 2) incomplete collection and evaluation of existing data,
- 3) field sampling plan unsupported by data quality objectives (DQOs), and
- 4) sample locations poorly presented.

See Colorado Department of Health letter to DOE and EG&G, dated May 22, 1992, (attached).

See DOE/RFO transmittal letter (92-DOE-4893) to EPA and CDH, dated April 30, 1992 (attached).

With regard to the first listed deficiency, information which was obtained after the transmittal of the Draft Historical Release Report was used to prepare the Draft Final Phase I RFI/RI Work Plan since it was judged to be more accurate than the information contained in the Draft Historical Release Report. DOE/RFO does not agree with this deficiency.

The remaining deficiencies are correct and were stated in DOE/RFO's April 30, 1992 transmittal letter to EPA and CDH.

## ACTIONS TAKEN TO DATE AND CURRENT STATUS:

DOE/RFO copied EG&G on the transmittal letter to EPA and CDH where the Work Plan deficiencies were stated. DOE/RFO requested verbally that EG&G have their subcontractor for the RFI/RI Work Plan, Advanced Sciences, Inc., complete the data collection and evaluation process so that an adequate Field Sampling Plan could be prepared. The additional data and Field Sampling Plan were to be presented to EPA and CDH in early June 1992 via scoping meetings.

Currently, the existing data for OU 8 are being collected, evaluated and summarized by EG&G's subcontractor.

DOE/RFO memoranda regarding contract procurement are included as attachments. The memoranda include:

ERD:HDR:0480	1/23/91	Procurement Policy Impact to IAG Milestones
ERD:FRL:2935	4/16/91	Performance Evaluation Report for EG&G
CSD:TA:4658	7/15/91	Performance Evaluation for the Period 1/1/91 - 3/31/91
ERD:FRL:5884	7/23/91	EG&G Performance Evaluation Report, Period 91/1
ERD:FRL:9119 Activities	10/24/91	Plant Support to Environmental Restoration
ERD:FRL:3845	4/1/92	Procurement and Engineering Support Systems

These memoranda address procurement contracting impacts to IAG milestones.

DOE/RFO memoranda regarding RFEDS are included as attachments. The memoranda include:

ERD:SG:2134	3/29/91	Rocky Flats Environmental Data Systems (RFEDS)
ERD:SG:3042	4/22/91	Rocky Flats Environmental Data System (RFEDS)
ERD:FRL:4626	6/11/91	Modified Performance Evaluation Report, CY91 for EG&G
ERD:FRL:1096	1/29/92	EG&G Performance Evaluation Report

In an effort to produce a Work Plan in compliance with the National Contingency Plan [40CFR Part 300.430 (b)] and the RFP IAG (Attachment 2 - Section VI), several scoping meetings were held. The initial scoping meeting was held on October 31, 1991, between DOE/RFO, EG&G, EPA and CDH. This was followed by a scoping meeting between DOE and EG&G on December 11, 1991. At this meeting, EG&G was informed that the scoping process for OU 8 should follow 40CFR Part 300.430 (b). In addition, 40CFR Part 300.430 (b) was reviewed in detail. Following award of the contract to Advanced Sciences, Inc., scoping meetings involving DOE/RFO, EG&G and Advanced Sciences were held on March 27 and April 8, 1992. Finally, scoping meetings with EPA and CDH were held on April 9 and 16, 1992.

ACTIONS PLANNED:

Revise the Draft Final Phase I RFI/RI Work Plan per the deficiencies listed in the Colorado Department of Health's, May 22, 1992, letter to DOE/RFO and EG&G and DOE/RFO's April 30, 1992, transmittal letter to EPA and CDH.

Transmit the revised Draft Final Phase I RFI/RI Work Plan to EPA and CDH by June 22, 1992.

ISSUE RECOMMENDATION/ADDITIONAL COMMENTS:

HEADQUARTERS ACTION:

☐ Information Dissemination

☐ Concurrence

☐ Issue Resolution

ISSUE DISPOSITION:

**ATTACHMENT**

**RCRA Permit No. 91-09-30-01**

01-09-30-01



I.D. NO. CO7890010526

Permit No. 91-09-30-01

Pursuant to the Colorado Hazardous Waste Act (Title 25 Article 15, Section 101 et seq.) hereafter called the Act and regulations promulgated thereunder by the Colorado Board of Health (Codified and to be codified in Title 6 of the Code of Colorado Regulations (CCR)), a State RCRA Permit is issued to the United States Department of Energy and its Prime Operating Contractor (jointly, "the Permittee") to operate a hazardous and low-level radioactive mixed waste storage facility located in Jefferson County, Colorado, centered at Latitude 39° 53' 30" North and Longitude 105° 11' 30" West. The Permittee must comply with all the terms and conditions of this permit.

This permit consists of the conditions contained herein (including those in any attachments) and the applicable regulations contained in 6 CCR 1007-3, Parts 260 through 268, 2, 99, and 100 as specified in the permit. Applicable regulations are those which in effect on the date of issuance of this permit. This permit is based on the assumption that the information submitted to the Hazardous Materials and Waste Management Division of the Colorado Department of Health (CDH) in the Permittee's Part A and Part B permit application dated November 28, 1986 as modified by subsequent revisions dated December 15, 1987, and April 13, 1988, (hereafter referred to as the application), and additional information submitted to clarify previously submitted material, is accurate. Any inaccuracies found in this information may be grounds for the termination or modification of this permit (see 6 CCR 1007-3, Section 100.6) and potential enforcement action. The Permittee must inform the Hazardous Materials Waste Management Division of the Colorado Department of Health of any deviation or changes in the application which would affect the Permittee's ability to comply with the applicable regulations or permit conditions.

This permit is effective thirty days after it is issued pursuant to 6 CCR 1007-3, Section 100.511 (b) and shall remain in effect until October 30, 1996 (5 year duration) unless revoked and reissued, or terminated.

Signed: \_\_\_\_\_

David C. Shelton, Director  
Hazardous Materials and Waste Management Division  
Colorado Department of Health

9-30-91  
Date

## PART XI- HSWA REQUIREMENTS

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D.5.

ATTACHMENT 2 - Rocky Flats Plant U.S.D.O.E.  
FEDERAL FACILITY AGREEMENT STATEMENT OF WORK

I.A. Introduction

The purpose of this attachment is to set forth the elements of work required to be performed to respond to all hazardous substance releases or threat of releases at or from the U.S. DOE Rocky Flats Plant (DOE) which may cause harm to human health or the environment. This attachment outlines work to be performed during the investigatory and study phase, ie; Remedial Investigation/Feasibility Study (RI/FS)/RCRA Facility Investigation/Corrective Measures Study (RFI/CMS), of the response process. It does not completely describe the specifics of the Submittals required during the remedial design, remedial action, or other implementation phases of the response program. All response activities performed by DOE shall be consistent with CERCLA, the National Oil and Hazardous Substances Pollution Contingency Plan (NCP), RCRA, and applicable State law. At a minimum, all response activities shall also be consistent with:

- Guidance for Conducting Remedial Investigations and Feasibility Studies Under CERCLA, Interim Final, October 1988.
- RCRA Facility Investigation Guidance, Interim Final, May 1989.
- Guidance on Preparing Superfund Decision Documents: The Proposed Plan and Record of Decision, March 1988.
- Test Methods for Evaluating Solid Waste: Physical/Chemical Methods, SW-846, October 1986.
- Compendium of Superfund Field Operation Methods, September 1987.
- Superfund Public Health Evaluation Manual, October 1986.
- Community Relations in Superfund: A Handbook, Interim Final, June 1988.
- Federal Register, Volume 52, Number 53, Thursday, March 19, 1987, pp. 8704 - 8709.
- Risk Assessment Guidance for Superfund, Volume II-Environmental Evaluation Manual, Interim Final, March, 1989.

[The most recent version of the above citations published at least four months prior to the required submittal date for each document shall always be used.]

Studies under CERCLA, Interim Final, October, 1988, Interim Guidelines and Specifications for Preparing Quality Assurance Project Plans, OAM-005/80, U.S. EPA, 1983, as amended, and OSWER Directive 9355.0-14, Quality Assurance/Field Operations Method Manual, April, 1986).

- IV.B. The SOP shall describe in detail, specific sampling techniques for a given objective, sampling equipment and procedures and general sample handling and analysis procedures. The SOP shall incorporate the sampling objectives of the Workplan for each OU as required by this Attachment and Table 5: Preliminary RFI/RI Workplan for Previously Identified Inactive Sites, and shall anticipate investigations beyond the work specified in this Attachment.
- V. Plan for the Prevention of Contaminant Dispersion. In order to minimize the potential for windblown dispersion of dusts containing hazardous substances or other harmful materials from all sites, DOE shall within 180 days of the effective date of this Agreement, prepare and submit a plan to EPA and the State for joint approval. The Plan for the Prevention of Contaminant Dispersion shall provide for the management of wastes associated with sites in such a manner as to prevent windblowing of hazardous or dangerous materials through techniques such as soil cover over hazardous and dangerous materials and/or use of appropriate wetting techniques during high wind conditions. High wind conditions are defined as winds blowing in excess of 15 mph or where visible particulate emissions leave the respective site(s).

DOE shall also include as part of the Plan, a proposal to evaluate the potential for and risk of windblown inorganic, radioactive and organic hazardous constituents released from sites at the Rocky Flats Plant. EPA and the State may require the installation of air monitoring systems for evaluating windblown releases from the sites, or require further corrective measures.

- VI. RFI/RI Workplans. DOE shall prepare RFI/RI Workplans for each OU that assure that each site identified in Table 1 is fully characterized and that a Baseline Risk Assessment is performed, as set forth below. The Workplans shall implement as initial steps the measures provided for in Table 5 of this Attachment. The RFI/RI Workplans shall be submitted to EPA and the State in accordance with schedules within Table 6 of this Attachment. The RFI/RI Workplans required by this Agreement shall meet the requirements as outlined in Section VI.B. of this Attachment and shall be implemented immediately upon joint approval by EPA and the State.
- VI.A. DOE shall prepare or amend RFI/RI Workplans to ensure that each spill and/or release described within the Historical Release Report, and within any amendments to the Historical Release Report, and identified by EPA and the State as requiring an RFI/RI, is investigated to establish site characteristics and nature and extent of contamination as set forth below. EPA and the State shall review the Historical

Release Report as required in paragraph I.B.5. above and shall notify DOE in writing that an RFI/RI Workplan is required. DOE shall submit the RFI/RI Workplan(s) to EPA and the State for review and approval as required by EPA and the State. The RFI/RI Workplan(s) required by this condition shall meet the requirements as outlined in section VI.B. of this Attachment and shall be implemented as required through the written approval by EPA and the State.

- VI.B. DOE shall develop RFI/RI Workplans for those sites as specified in Sections VI. and VI.A. above. The Workplans shall include a summary of the existing data in terms of physical and chemical characteristics of the contaminants identified, and their distribution among the environmental media at each site. The plans shall also include a conceptual "model" describing the contaminant sources, and potential migration and exposure pathways and receptors. In addition, the plans will include a description of each site investigation and management strategy developed by DOE during scoping; a preliminary identification of remedial alternatives and data needs for evaluation of remedial alternatives. The plans will reflect coordination with the treatability study requirements as outlined in this Attachment, and any additional treatability studies required through the CMS/FS process. The plans shall include processes, schedules for, and manner of, identifying Federal and State requirements (chemical-specific, location-specific, and action specific applicable or relevant and appropriate requirements) (ARARs).

The Workplans shall include detailed descriptions of the tasks to be performed, information needed for each task (e.g., for health and environmental risk evaluation), information to be produced during and at the conclusion of each task, and a description of the work products that will be submitted to EPA and the State. The RFI/RI Workplans shall include a Field Sampling Plan (FSP) which shall describe in detail, specific OU background information, sampling objectives for each site within each OU, sample location, and minimum frequency for each task and/or operation for a given objective, sample designation procedures, sampling equipment and procedures and sample handling and analysis protocol. The FSP shall incorporate the sampling objectives of Table 5, and shall anticipate investigations beyond the work specified in this Attachment. DOE will refer to Appendix B of the October 1988 Interim Final RI/FS Guidance for a comprehensive description of the contents of the required Workplans.

Because of the unknown nature of many of the sites and the iterative nature of the RFI/RI and CMS/FS, additional data requirements and analyses may be identified throughout the process. DOE shall submit technical memorandums to EPA and the State documenting the need for additional data, and identifying the data quality objectives (DQOs) whenever such requirements are identified. These technical memorandums shall be attached as an amendment to the approved Workplans for each OU after approval by EPA and the State. In any event, DOE is responsible for fulfilling additional data and analysis needs identified by EPA and the State,

consistent with the general scope and objectives of each RFI/RI and CMS/FS. The Workplans shall provide for the activities in subparagraphs VI.B.1.- VI.B.5.b. below.

- VI.B.1. Investigate and define site physical characteristics. DOE shall collect data on the physical characteristics of each site and its surrounding areas including the physiography, geology, and hydrology, and specific physical characteristics identified in the Workplans. This information will be ascertained through a combination of physical measurements, observations, and sampling efforts and shall be utilized to define potential transport pathways and receptor populations. In defining each site's physical characteristics, DOE shall also obtain sufficient engineering data (such as pumping characteristics) for the projection of contaminant fate and transport, and the development and screening of corrective/remedial action alternatives, including information to assess treatment technologies.
- VI.B.2. Define sources of contamination. DOE shall locate each source of contamination. For each location, the areal extent and depth of contamination shall be determined by sampling at incremental depths of a sampling grid. The physical characteristics and chemical constituents and their concentrations shall be determined for all known and discovered sources of contamination. DOE shall conduct sufficient sampling to define the boundaries of the contaminant sources to the level established in the QA/QC plan and DQOs. Defining the source of contamination shall include analyzing the potential for contaminant releases (e.g., long term leaching from soil), contaminant mobility and persistence, and characteristics important for evaluating corrective/remedial actions, including information to assess treatment technologies.
- VI.B.3. Describe the nature and extent of contamination. DOE shall gather information to describe the nature and extent of contamination as a final step during the field investigation. To describe the nature and extent of contamination, DOE shall utilize the information on each site's physical characteristics and sources of contamination to give a preliminary estimate of the contaminants that may have migrated. DOE shall then implement an iterative monitoring program and any study program identified in the Workplan or SAP such that by using analytical techniques sufficient to detect and quantify the concentration of contaminants, the migration of contaminants through the various media at each site can be determined. In addition, DOE shall gather data for calculations of contaminant fate and transport. This process is continued until the area and depth of contamination are known to the level of contamination established in the QA/QC plan and DQOs. Information on the nature and extent of contamination shall be utilized to determine the level of risk presented by each site and shall help to determine aspects of the appropriate remedial action alternatives to be evaluated.
- VI.B.4. Evaluate site characteristics. DOE shall analyze and evaluate the data to describe: 1) each site's physical characteristics, 2) contaminant source characteristics and, 3)

nature and extent of contamination, and 4) contaminant fate and transport. Results of each site's physical characteristics, source characteristics, and nature and extent of contamination analyses are utilized in the analysis of contaminant fate and transport. The evaluations shall include the actual and potential magnitude of releases from the sources, and horizontal and vertical spread of contamination as well as mobility and persistence of contaminants. Where modeling is appropriate, such models shall be identified to EPA and the State in a technical memorandum prior to their use. All data and programming, including any proprietary programs, shall be made available to EPA and the State together with a sensitivity analysis. Also, this evaluation shall provide any information relevant to each site's characteristics necessary for evaluation of the need for Corrective/Remedial Action in the Baseline Risk Assessment and for the development and evaluation of remedial alternatives. Analyses of data collected for each site's characterization shall meet the DQOs developed in the QA/QC plan stated in the SAP (or revised during the RFI/RI).

VI.B.5. Data Management Procedures. DOE shall consistently document the quality and validity of field and laboratory data compiled during the RFI/RI.

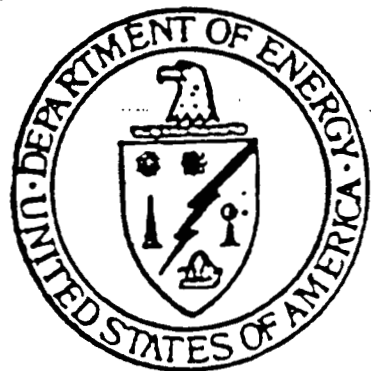
VI.B.5.a. Document field activities. Information gathered during each characterization shall be consistently documented and adequately recorded by DOE in well maintained field logs and laboratory reports. The method(s) of documentation shall be specified in the Workplans and/or the SAP. Field logs shall be utilized to document observations, measurements, and significant events that have occurred during field activities. Laboratory reports shall document sample custody, analytical responsibility, analytical results, adherence to prescribed protocols, nonconformity events, corrective measures, and/or data deficiencies.

VI.B.5.b. Maintain sample management and tracking DOE shall maintain field reports, sample shipment records, analytical results, and QA/QC reports to ensure that only validated analytical data are reported and utilized in the development and evaluation of corrective/remedial alternatives. Analytical results developed under the Workplans shall not be included in any characterization reports unless accompanied by or cross-referenced to a corresponding QA/QC report which shall be submitted. In addition, DOE shall establish a data security system to safeguard chain-of-custody forms and other project records to prevent loss, damage, or alteration of project documentation.

VII. OU Characterization Deliverables. DOE shall prepare and submit Phase I RFI/RI Reports for OUs 3 - 16, including the Preliminary Site Characterization (PSC), the Phase III RFI/RI Report for OU 1, and the Phase II RFI/RI Report for OU 2, as required by the schedules within Table 6 of this Attachment. If further characterization of an OU is required by EPA and/or the State, additional phases of investigation shall be conducted by DOE. Once the Baseline Risk Assessment is completed for each OU and each OU has been characterized as approved, the

# ROCKY FLATS INTERAGENCY AGREEMENT

JANUARY 22, 1991





ATTACHMENT 2 - Rocky Flats Plant U.S.D.O.E.  
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- Risk Assessment Guidance for Superfund, Volume II-Environmental Evaluation Manual, Interim Final,

materials and/or use of appropriate wetting techniques during high wind conditions. High wind conditions are defined as winds blowing in excess of 15 mph or where visible particulate emissions leave the respective site(s).

DOE shall also include as part of the Plan, a proposal to evaluate the potential for and risk of windblown inorganic, radioactive and organic hazardous constituents released from sites at the Rocky Flats Plant. EPA and the State may require the installation of air monitoring systems for evaluating windblown releases from the sites, or require further corrective measures.

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VI.A. DOE shall prepare or amend RFI/RI Workplans to ensure that each spill and/or release described within the Historical Release Report, and within any amendments to the Historical Release Report, and identified by EPA and the State as requiring an RFI/RI, is investigated to establish site characteristics and nature and extent of contamination as set forth below. EPA and the State shall review the Historical Release Report as required in paragraph I.B.5. above and shall notify DOE in writing that an RFI/RI Workplan is required. DOE shall submit the RFI/RI Workplan(s) to EPA and the State for review and approval as required by EPA and the State. The RFI/RI Workplan(s) required by this condition shall meet the requirements as outlined in section VI.B. of this Attachment and shall be implemented as required through the written approval by EPA and the State.

VI.B. DOE shall develop RFI/RI Workplans for those sites as specified in Sections VI. and VI.A. above. The Workplans shall include a summary of the existing data in terms of physical and chemical characteristics of the contaminants identified, and their distribution among the environmental media at each site. The plans shall also include a conceptual "model" describing the contaminant sources, and potential migration and exposure pathways and receptors. In addition, the

plans will include a description of each site investigation and management strategy developed by DOE during scoping; a preliminary identification of remedial alternatives and data needs for evaluation of remedial alternatives. The plans will reflect coordination with the treatability study requirements as outlined in this Attachment, and any additional treatability studies required through the CMS/FS process. The plans shall include processes, schedules for, and manner of, identifying Federal and State requirements (chemical-specific, location-specific, and action specific applicable or relevant and appropriate requirements) (ARARs).

The Workplans shall include detailed descriptions of the tasks to be performed, information needed for each task (e.g., for health and environmental risk evaluation), information to be produced during and at the conclusion of each task, and a description of the work products that will be submitted to EPA and the State. The RFI/RI Workplans shall include a Field Sampling Plan (FSP) which shall describe in detail, specific OU background information, sampling objectives for each site within each OU, sample location, and minimum frequency for each task and/or operation for a given objective, sample designation procedures, sampling equipment and procedures and sample handling and analysis protocol. The FSP shall incorporate the sampling objectives of Table 5, and shall anticipate investigations beyond the work specified in this Attachment. DOE will refer to Appendix B of the October 1988 Interim Final RI/FS Guidance for a comprehensive description of the contents of the required Workplans.

Because of the unknown nature of many of the sites and the iterative nature of the RFI/RI and CMS/FS, additional data requirements and analyses may be identified throughout the process. DOE shall submit technical memorandums to EPA and the State documenting the need for additional data, and identifying the data quality objectives (DQOs) whenever such requirements are identified. These technical memorandums shall be attached as an amendment to the approved Workplans for each OU after approval by EPA and the State. In any event, DOE is responsible for fulfilling additional data and analysis needs identified by EPA and the State, consistent with the general scope and objectives of each RFI/RI and CMS/FS. The Workplans shall provide for the activities in subparagraphs VI.B.1.- VI.B.5.b. below.

VI.B.1. Investigate and define site physical characteristics.

DOE shall collect data on the physical characteristics of each site and its surrounding areas including the physiography, geology, and hydrology, and specific physical characteristics identified in the Workplans. This information will be ascertained through a combination of physical measurements, observations, and sampling efforts and shall be utilized to define potential transport pathways and receptor populations. In defining each site's physical characteristics, DOE shall also obtain sufficient engineering data (such as pumping characteristics) for the projection of contaminant fate and transport, and the development and screening of corrective/remedial action alternatives, including information to assess treatment technologies.

VI.B.2. Define sources of contamination. DOE shall locate each source of contamination. For each location, the areal extent and depth of contamination shall be determined by sampling at incremental depths of a sampling grid. The physical characteristics and chemical constituents and their concentrations shall be determined for all known and discovered sources of contamination. DOE shall conduct sufficient sampling to define the boundaries of the contaminant sources to the level established in the QA/QC plan and DQOs. Defining the source of contamination shall include analyzing the potential for contaminant releases (e.g., long term leaching from soil), contaminant mobility and persistence, and characteristics important for evaluating corrective/remedial actions, including information to assess treatment technologies.

VI.B.3. Describe the nature and extent of contamination. DOE shall gather information to describe the nature and extent of contamination as a final step during the field investigation. To describe the nature and extent of contamination, DOE shall utilize the information on each site's physical characteristics and sources of contamination to give a preliminary estimate of the contaminants that may have migrated. DOE shall then implement an iterative monitoring program and any study program identified in the Workplan or SAP such that by using analytical techniques sufficient to detect and quantify the concentration of contaminants, the migration of contaminants through the various media at each site can be determined. In addition, DOE shall gather data for calculations of contaminant fate and transport. This process is continued until the area and depth of contamination are known to the level of contamination established in the QA/QC plan and DQOs. Information on the nature and extent of contamination shall be utilized to determine the level of risk

presented by each site and shall help to determine aspects of the appropriate remedial action alternatives to be evaluated.

VI.B.4. Evaluate site characteristics. DOE shall analyze and evaluate the data to describe: 1) each site's physical characteristics, 2) contaminant source characteristics and, 3) nature and extent of contamination, and 4) contaminant fate and transport. Results of each site's physical characteristics, source characteristics, and nature and extent of contamination analyses are utilized in the analysis of contaminant fate and transport. The evaluations shall include the actual and potential magnitude of releases from the sources, and horizontal and vertical spread of contamination as well as mobility and persistence of contaminants. Where modeling is appropriate, such models shall be identified to EPA and the State in a technical memorandum prior to their use. All data and programming, including any proprietary programs, shall be made available to EPA and the State together with a sensitivity analysis. Also, this evaluation shall provide any information relevant to each site's characteristics necessary for evaluation of the need for Corrective/Remedial Action in the Baseline Risk Assessment and for the development and evaluation of remedial alternatives. Analyses of data collected for each site's characterization shall meet the DQOs developed in the QA/QC plan stated in the SAP (or revised during the RFI/RI).

VI.B.5. Data Management Procedures. DOE shall consistently document the quality and validity of field and laboratory data compiled during the RFI/RI.

VI.B.5.a. Document field activities. Information gathered during each characterization shall be consistently documented and adequately recorded by DOE in well maintained field logs and laboratory reports. The method(s) of documentation shall be specified in the Workplans and/or the SAP. Field logs shall be utilized to document observations, measurements, and significant events that have occurred during field activities. Laboratory reports shall document sample custody, analytical responsibility, analytical results, adherence to prescribed protocols, nonconformity events, corrective measures, and/or data deficiencies.

VI.B.5.b. Maintain sample management and tracking. DOE shall maintain field reports, sample shipment records, analytical results, and QA/QC reports to

ensure that only validated analytical data are reported and utilized in the development and evaluation of corrective/remedial alternatives. Analytical results developed under the Workplans shall not be included in any characterization reports unless accompanied by or cross-referenced to a corresponding QA/QC report which shall be submitted. In addition, DOE shall establish a data security system to safeguard chain-of-custody forms and other project records to prevent loss, damage, or alteration of project documentation.

VII. OU Characterization Deliverables. DOE shall prepare and submit Phase I RFI/RI Reports for OUs 3 - 16, including the Preliminary Site Characterization (PSC), the Phase III RFI/RI Report for OU 1, and the Phase II RFI/RI Report for OU 2, as required by the schedules within Table 6 of this Attachment. If further characterization of an OU is required by EPA and/or the State, additional phases of investigation shall be conducted by DOE. Once the Baseline Risk Assessment is completed for each OU and each OU has been characterized as approved, the Final RFI/RI Report for each OU shall be approved.

VII.A. Preliminary Site Characterization Summary. The Phase I RFI/RI Report(s) required for OUs 3 - 16 shall include a "Preliminary Site Characterization Summary" (PSC) as a chapter of the Phase I RFI/RI Reports. These PSC summaries shall present the investigative activities which have taken place, and describe and display OU data documenting the location and characteristics of surface and subsurface features and contamination at each site within each OU including the affected media, location of contaminants, types of contaminants, physical state of contaminants, concentration of contaminants and quantity of contaminants. In addition, the location, dimensions, physical condition and varying concentrations of each contaminant throughout each source and the extent of contaminant migration through each of the affected media shall be documented. The data developed for the PSC summary(s) shall be used by DOE to develop the Baseline Risk Assessment for each OU. The PSC summaries shall provide EPA and the State with a preliminary reference for evaluating the Baseline Risk Assessment for each OU, evaluating the development and screening of corrective/remedial alternatives and the determination and evaluation of ARARs. EPA and the State will evaluate these documents for adequacy, to direct DOE to conduct further investigation and to evaluate the Baseline Risk Assessments for each OU. The PSC summaries will also be used by EPA and the State to

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# memorandum

DATE: JAN 23 1991

REPLY TO  
ATTN OF: ERD:HDR:0480

SUBJECT: Procurement Policy Impact to IAG Milestones

TO: J.M. Kersh, Associate General Manager  
Environmental Restoration and Waste Management  
EG&G, Rocky Flats, Inc.

The procurement policy change indicated in the November 23, 1990 letter from R. M. Nelson to J. O. Zane required substantial changes in EG&G contracting procedures. These changes have impacted many of the environmental restoration projects and IAG milestone delivery dates. Your letter, 90-RF-7525, dated December 20, 1990, identified these impacts from the contracting delays. The UNC Geotech and Riedel contracts (items 3, 8 and 9 from your letter) are now essentially resolved due to our staff's joint efforts. The remaining issues, involving support from BOA contracts, must receive similar emphasis and effort. Some extensions have been requested and approved by the regulatory agencies. I must emphasize, however, that your organization must still work aggressively to resolve the contract documentation shortfalls in order to meet the IAG milestones.

I have two concerns about the remaining contract problems. The first is the priority for the contracts. The priority list you attached to your letter and characterized as representing DOE priorities is actually an EG&G list generated by procurement. From an Environmental Restoration perspective the priorities are unacceptable, and I would encourage you to work to elevate the priority of ER-related contracts. Secondly, DOE Administration Division has demonstrated willingness to be somewhat flexible if adequate justifications are clearly and completely presented. The burden is on EG&G to do the background work necessary to make the system work.

Clearly, contracting for services will continue to be a challenge in the future. We must take steps now to change our way of thinking and doing business so that further IAG milestones are not jeopardized. Fixed-price contracting should be strongly encouraged for all contracts. I have asked my Environmental Restoration Division to prepare a list of IAG services to be targeted for fixed-price competition. I am requesting you to identify the appropriate staff members to participate with my ER staff to create this fixed-price competition list. I anticipate finalization of this list by February 1, 1991.

ERD  
Lockhart:mak  
1/ /91

AMEM  
Simonson  
1/ /91



J. M. Kersh  
Page 2

Please contact Frazer Lockhart of my staff at extension 7846 for further discussion or clarification.

David P. Simonson, Acting Assistant Manager  
for Environmental Management

cc:  
R. M. Nelson, Jr., DOE/RFO  
H. Rose, DOE/RFO  
E. Evered, EG&G/RF  
T. Greengard, EG&G/RF

# memorandum

Rocky Flats Office

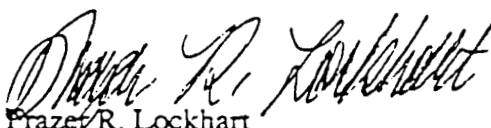
DATE: JUL 23 1991

REPLY TO  
ATTN OF: ERD:FRL:5884

SUBJECT: EG&amp;G Performance Evaluation Report , Period 91/1

TO: Marshall L. Bishop, Assistant Manager for Administration

Attached is the Performance Evaluation Report input for EG&G from Environmental Restoration Division. This covers the period from April 1, 1991 to June 30, 1991. I am also providing a Macintosh disk to Terrel Agy with the PER information in Word 4.0 format, as requested. Please contact me at extension 7846 if there are questions.



Prazet R. Lockhart  
Director  
Environmental Restoration Division

Attachment

cc w/Attachment:  
R. Greenberg, EM-45  
D. Simonson, DOE/RFO  
R. Schassburger, DOE/RFO  
H. Rose, DOE/RFO  
T. Agy, DOE/RFO

## PERFORMANCE EVALUATION REPORT


EG&G ROCKY FLATS, INC.  
CONTRACT NO. DE-AC04-90DP62349  
FOR THE PERIOD APRIL 1 - JUNE 30, 1991

PERFORMANCE MONITOR: FRAZER R. LOCKHART  
AREAS EVALUATED: B.1, B.3, D.2, D.3

SECTION I  
EXECUTIVE SUMMARY

Performance Area: B.1 ES&H ISSUE MANAGEMENT

Suggested Adjectival Rating: Marginal

Procurement [ The Contractor continues to struggle with issues concerning the environmental restoration (ER) program. Procurement schedules and delays continue to create problems with meeting milestones committed to in the Interagency Agreement (IAG). In addition, problems with design reviews and engineering support are also creating unacceptable delays. EG&G has shown limited initiative in self audit activities to discover ER problems, and in many cases has not taken action to correct deficiencies until directed by DOE. With few exceptions, management of ES&H issues related to environmental restoration have been reactive, slow, and barely sufficient to meet requirements resulting in the summary rating of marginal. ] 

Performance Area: B.2 CONDUCT OF OPERATIONS IMPROVEMENTS

Suggested Adjectival Rating: N/A

Performance Area: B.3 ADMINISTRATIVE SUPPORT

Suggested Adjectival Rating: N/A

Performance Area: C. SAFETY, HEALTH AND QA PROGRAM

Suggested Adjectival Rating: N/A

Performance Area: D.1 WASTE MANAGEMENT PROGRAM

Suggested Adjectival Rating: N/A

## SECTION II ACHIEVEMENTS/DEFICIENCIES/OBSERVATIONS

### B.1 ES&H ISSUE MANAGEMENT

#### Significant Achievements

None.


#### Notable Achievement

None.

#### Significant Deficiencies

None.

#### Notable Deficiencies

*Procurement* { Support to Environmental Restoration projects from organizations outside ER/WM, particularly procurement, engineering and security, appears to be lacking and responsible for substantial delays. Two specific examples are the extended time schedules for the Woman Creek Interim Remedial Action (OU2) and the cross-flow filtration system for the OU2 treatment system. Acquiring necessary support from other organizations was first identified as a serious problem in November 1990 for procurement and January 1991 for security. Although some improvements have been noted and ER staff continue attempts to coordinate improvements, major program impacts are still being experienced. } 


The system for issue identification and follow-up within ER continues to be weak. Numerous examples exist, but two specific examples are discussed for illustration. A courtesy review was conducted on the cost estimating for ER programs by a team from DOE HQ in February 1991 and found numerous problems. All the deficiencies could have been easily found by a self-audit had one been conducted. Since that review, very little has been done to make progress toward resolution of the issues and deficiencies in the system. A second example is the issue of future use for the uranium chip roaster. The DOE identified that a change in intended use by the waste organization had created an issue of cleanup responsibility. This issue was discussed and passed to EG&G in May 1991, with no visible action since that time. Overall, there appears to be limited energy within the ER organization to seek out problems or self-initiate solutions.

#### Observations

EG&G has complied with Interagency Agreement requirements to provide a monthly status report on environmental restoration progress. This report has been acceptable in providing a narrative summary of activities, however it lacks cost and schedule details and is therefore currently more of a community relations tool than a management tool. Progress toward full reporting, consistent with the Management Control System (MCS) development, is satisfactory and is expected to allow improved reporting in the future.

### SECTION III, PART B: SUMMARY OF CONTRACTOR'S PERFORMANCE IN AREAS EVALUATED WHERE THE RATING WAS OTHER THAN SATISFACTORY

#### B.1 ES&H ISSUE MANAGEMENT

procurement [ The overall management of ES&H issues from the perspective of environmental restoration has been less than satisfactory. Problems with resolution of procurement and engineering support issues results in unacceptable impacts to the environmental restoration (ER) program. These problems are compounded by a general unwillingness to seek out problems and self-initiate actions for correction. In most cases problems are discovered by DOE, elevated to the appropriate management level by DOE, and do not receive corrective action until directed by DOE. Despite these general failings, EG&G has made good progress in supporting the Management Control System initiative. ER is part of the organization taking the lead in preparing and providing work packages for the first true Rocky Flats baseline. Even with this positive effort, my overall assessment of this area is below the expected performance level and is therefore marginal. ] 

#### B.2 CONDUCT OF OPERATIONS IMPROVEMENTS

N/A

#### B.3 ADMINISTRATIVE SUPPORT

N/A

#### C. SAFETY, HEALTH, AND QA PROGRAM

N/A

#### D.1 WASTE MANAGEMENT PROGRAM

N/A

#### D.2 ENVIRONMENTAL PROTECTION

This area is rated marginal based on actions following the groundwater sampling problem during the first calender quarter. The failure to monitor groundwater wells required for RCRA compliance and the causes leading to that problem were identified during last evaluation period. Comments in this evaluation are focused toward resolution of the problem. Overall, EG&G was slow to respond to the issue and raise it to the proper level of management, fully two weeks after being identified at the staff level. Once the corrective action

United States Government

Department of Energy

# memorandum

Rocky Flats Office

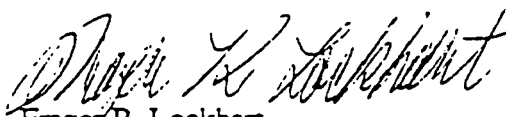
DATE: APR 16 1991

REPLY TO  
ATTN OF: ERD:FRL:2935

SUBJECT: Performance Evaluation Report for EG&amp;G

TO: Marshall L. Bishop, Director  
Administration Division

Attached is the Predecisional Performance Evaluation Report for EG&G Environmental Restoration from January 1, 1991 to March 31, 1991. Please contact me at extension 7846 if there are questions.



Frazer R. Lockhart  
Director  
Environmental Restoration Division

Attachment

cc:  
D. Simonson, DOE/RFO  
H. Rose, DOE/RFO  
T. Agy, DOE/RFO

# PERFORMANCE EVALUATION REPORT


EG&G ROCKY FLATS, INC.  
CONTRACT NO. DE-AC04-90DP62349  
FOR THE PERIOD JANUARY 1 - MARCH 31, 1991

PERFORMANCE MONITOR: FRAZER R. LOCKHART  
AREAS EVALUATED: B.1, D.2, D.3

## SECTION I EXECUTIVE SUMMARY

### Performance Area: B.1 ES&H ISSUE MANAGEMENT

Suggested Adjectival Rating: Marginal

procurement [ The Contractor has attempted to address numerous issues during this rating period with varying degrees of success. The support to the Colorado Water Quality Control Commission hearings on site-specific groundwater standards was very successful, and should serve as an example for an aggressive, coordinated effort to meet clear goals. Other efforts have been less successful. Procurement and security impacts created problems with meeting milestones committed to in the Interagency Agreement (IAG). EG&G had significant trouble quantifying the impacts to other milestones throughout the schedule, and providing this information in a timely fashion. Also, EG&G had difficulty prioritizing and placing sufficient effort to compliance issues such as well sampling in support of the remediation programs. With few exceptions, management of ES&H issues related to environmental restoration, NEPA and groundwater have been reactive, slow, and barely sufficient resulting in the summary rating of marginal. ] 

### Performance Area: B.2 CONDUCT OF OPERATIONS IMPROVEMENTS

Suggested Adjectival Rating: N/A

### Performance Area: B.3 ADMINISTRATIVE SUPPORT

Suggested Adjectival Rating: N/A

### Performance Area: C. SAFETY, HEALTH AND QA PROGRAM

Suggested Adjectival Rating: N/A

### Performance Area: D.1 WASTE MANAGEMENT PROGRAM

Suggested Adjectival Rating: N/A

## SECTION II ACHIEVEMENTS/DEFICIENCIES/OBSERVATIONS

### B.1 ES&H ISSUE MANAGEMENT

#### Significant Achievements

None.


#### Notable Achievement

The EG&G planning, support and execution of testimony to the Colorado Water Quality Control Commission (CWQCC) hearings on site-specific groundwater standards was excellent. Through EG&G efforts, Rocky Flats Plant was able to reach agreement or compromise on all key aspects of our positions relative to the new proposed standards. This was accomplished despite a generally negative public atmosphere and a 'ratcheting' of surface water standards at the last CWQCC hearings.


#### Significant Deficiencies

The management of the security concerns relative to the groundwater sampling was deficient for two reasons. The DOE believes that the EG&G decision to discontinue "CERCLA" sampling for the first calendar quarter of 1991 adversely impacted the credibility of our sampling program and may have been a violation of law. This is due to the fact that some of the so-called "CERCLA" wells actually support a RCRA closure and therefore are covered by RCRA. Further, formal notice of this decision was provided to DOE by letter dated March 21, 1991, too late for the DOE to provide any corrective response before the end of the quarter.

#### Notable Deficiencies



A number of milestones shown in Table 6 of the Interagency Agreement (IAG) have been requested for extension. Some of the requests have not been provided at least two weeks before the milestone date. In several cases these requests have failed to quantify the full and complete impacts to future milestones. These problems have confounded the DOE's attempts to provide accurate and timely extension requests from the regulators as required by Part 42 of the IAG.



#### Observations

EG&G has complied with Interagency Agreement requirements to provide a monthly status report on environmental restoration progress. This report has been acceptable in providing a narrative summary of activities. Plans and schedules are evolving within environmental restoration consistent with the evolution of the Management Control System (MCS) within EG&G. MCS information is not currently at the level desired by DOE, but the progress toward full reporting is satisfactory.



Notable Deficiencies

The Groundwater Management Plan was delayed from February 15, 1991 to March 29, 1991 with the concurrence of the DOE. However, delivery of the Groundwater Management Plan is at least two weeks late beyond the revised date. Since this plan will form the basis for an overall groundwater management strategy, it is a key document to be completed. The well sampling problem described in B.1 above is another indicator of the need to finalize this plan.

Observations

Execution of the practices and procedures supporting the Groundwater Management Plan have been delayed due to delays in plan completion.

D.3 ENVIRONMENTAL RESTORATION AND NEPA IMPLEMENTATIONSignificant Achievements

None.

Notable Achievement

The Community Relations Plan documents were completed on schedule and represent positive outreach efforts to the community. Innovative meeting forums and communication means have improved the character of the Community Relations program. Efforts toward developing a Technical Review Group have also been positive as work continues in this area.

Significant Deficiencies

None.

Notable Deficiencies

EG&G has struggled to meet Interagency Agreement (IAG) milestones during this reporting period due to impacts from security and procurement problems. Documents have been delivered in time to meet IAG milestones, but often later than internal schedules, resulting in minimal time for the DOE Rocky Flats Office staff to review. One specific example is the Air Standard Operating Procedure which the DOE was not provided time to review and which was totally unacceptable since it was for stack sampling, not environmental restoration activities. Improvement is expected in the overall commitment to quality deliverables against the milestones as listed in Table 6 of the Interagency Agreement (IAG).

Procurement



Observations

EG&G management of the environmental restoration effort is generally reactive and focused toward minimum acceptable efforts. Verbal and written commitments generally require follow-up by DOE staff to ensure completion of the tasks. Programmatic problems are not usually met with aggressive and creative proposals for resolution, but rather with unsupported requests for schedule delays. The

## PREDECISIONAL

considered in view of the other Environmental Protection Plans and the input of the Environmental Monitoring Branch to arrive at an overall summary rating.

### D.3 ENVIRONMENTAL RESTORATION AND NEPA IMPLEMENTATION

 [ The overall EG&G management of the environmental restoration program has met minimum requirements, but has not met the expected performance by the DOE. Most of the milestones during this reporting period were extended, and still the documents were often delivered without time for meaningful review by the DOE prior to required delivery to the regulators. Inaccurate and inappropriate documents were provided to the regulators on several occasions due to this circumstance. The efforts in NEPA strategy planning also fell short of DOE expectations, although the general NEPA support to Rocky Flats activities was good and timely. Community Relations efforts provided the best example of successful, committed management and execution amongst all the environmental restoration requirements. The remedial activities form the biggest part of the evaluation area, however, and their overall marginal performance results in the marginal rating for this area. ] 

### E. SAFEGUARDS AND SECURITY

N/A

### F. OPERATIONS

N/A

### G. PLUTONIUM RECOVERY MODIFICATION PROJECT

N/A


## SECTION III, PART C: FULL DISCUSSION OF CONTRACTOR'S PERFORMANCE IN EACH EVALUATION AREA

## B.1 ES&amp;H ISSUE MANAGEMENT

The evaluation of this area had many issues which developed during the reporting period. The basis of the achievements, deficiencies and observations are discussed below.

The preparation for and execution of the groundwater standards hearing by the Colorado Water Quality Control Commission was an excellent example of aggressive, well-focused issue management. Meetings were held to define goals and strategy early in the process. Based on that strategy, a set of positions with supporting material were prepared to support the Rocky Flats position. All potentially affected organizations were drawn into the issue to provide input and review. Actual results of the hearing and pre-hearing stipulations provided for all Rocky Flats positions to be accepted or negotiated to a position acceptable to Rocky Flats. In view of the generally negative publicity surrounding Rocky Flats and the continued push for tighter restrictions, this successful outcome was notable.

Security restrictions and escorting rules from the Threat Level 'B' condition had severe impacts on the environmental activities in the buffer zone. Many more escorts were required than under normal threat conditions. In response to the lack of escorts, EG&G management selectively eliminated some environmental activities, thus reducing the demand on escorts. These selections were not approved or offered for approval to DOE, and notification of the action to eliminate CERCLA wells from monitoring during the first calendar quarter of 1991 did not occur until the EG&G letter dated March 21, 1991, six work days before the end of the quarter. The decisions impact several aspects of the Interagency Agreement (IAG), making it mandatory that DOE be consulted before action is taken. Also, the decisions appear to DOE to be in violation of RCRA, potentially creating a direct statutory non-compliance which DOE would not support. The handling of this issue is considered to be a significant deficiency, and reflective of the generally poor handling of the security impacts relative to environmental activities.

Procurement [ Procurement and security issues resulted in EG&G requesting extensions for seventeen of twenty-one IAG milestones during the reporting period. Requests for extension did not provide a full detailing of all impacts to other related milestones, with sufficient detail to justify additional extensions. The IAG requires that DOE identify and quantify all 'downstream' impacts resulting from any requested milestone extension. EG&G input has not been sufficient to allow this requirement to be met. ] 

The environmental restoration organization has completed two monthly reports for February and March, required by the IAG. This recurring report, due the 20th of each month, has provided a good narrative discussion of the status and issues concerning the IAG activities. Management Control System cost and schedule data is still missing, but is expected to be included as the overall plant Management Control System reporting evolves.

# memorandum

Rocky Flats Office

DATE: JUL 15 1991

REPLY TO  
ATTN OF: CSD:TA:4658

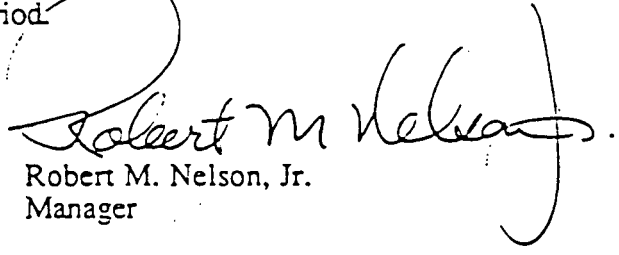
SUBJECT: Performance Evaluation for the Period 1/1/91- 3/31/91

TO: James O. Zane  
General Manager  
EG&G Rocky Flats, Inc.

The second practice evaluation of EG&G's performance at the Rocky Flats Plant has been completed. This evaluation covered the period January 1, 1991, through March 31, 1991. As you know, this was not an evaluation involving award fee but was done to provide training in such evaluations for both Rocky Flats Office and EG&G personnel. In addition, this evaluation exercise provided a basis for mutual discussions of both positive and negative aspects of EG&G management, compliance and operations.

I have determined that EG&G Rocky Flats, Inc., earned an overall rating of "Marginal" for this evaluation period. The enclosed Evaluation Summary Report for the period provides the basis for my determination. Had EG&G been on award fee, the overall numerical performance score recommended to DOE HQ for concurrence would have been 74.5 for the period.

RFO Assistant Managers and Performance Monitors are being requested to discuss the evaluations with their counterparts in EG&G. I am both willing to meet with you and discuss the rating and offer you the opportunity to present to me, or my designee, an analysis of your performance during the period.



Robert M. Nelson, Jr.  
Manager

Enclosure

cc w/Attn:  
Victor Stello, Jr., DP-2.1, DOE HQ  
Lake H. Barrett, DP-6, DOE HQ  
James P. Beiriger, DP-542.1, DOE HQ

of adequate staffing, lack of full time management commitment, and lack of an approved QA Plan and implementing procedures. Progress has been made in the Phase 1 Plan issue screening/topic selection process. However, this progress may be offset by the lack of qualifications, training, and experience of the team members and may result in some level of re-screening. SEP work is continuing to progress without the implementation of final Phase 1 and Management Plans.

Quality Assurance: The EG&G quality assurance program has continued to develop towards implementation of the NQA-1 quality standard and compliance to DOE order 5700.6B. During the early phases of this rating period EG&G did not have a clear understanding of what was needed to implement NQA-1; consequently the resources and time required to implement NQA-1 was greater than they had anticipated. Quality assurance activities in support of Resumption were improved from previous efforts in support of Resumption.

Performance Area: D.1 WASTE MANAGEMENT PROGRAM (10%)

Adjectival Rating: Satisfactory

The Contractor has attempted to address numerous issues during this rating period with varying degrees of success. The support to the Colorado Water Quality Control Commission hearings on site-specific groundwater standards was very successful, and should serve as an example for an aggressive, coordinated effort to meet clear goals. Other efforts have been less successful. Procurement and security impacts created problems with meeting milestones committed to in the Interagency Agreement (IAG). EG&G had significant trouble quantifying the impacts to other milestones throughout the schedule, and providing this information in a timely fashion. Also, EG&G had difficulty prioritizing and placing sufficient effort toward compliance issues such as well sampling in support of the remediation programs. With few exceptions, management of ES&H issues related to environmental restoration, NEPA and groundwater have been reactive, slow, and barely sufficient.

Procurement

Completion of the Roadmaps and Five-Year Plan during the quarter were noteworthy achievements as both of the efforts required significant personnel resource allocation and effective management. EG&G assigned a project manager for the Solar Pond Cleanout Program and awarded the subcontract for sludge/pondcrete solidification. EG&G efforts to effectively track waste management funding continue to improve over general plant budget management.

Program and project schedules continue to be delayed due in part to an inability to effectively integrate and prioritize waste management efforts with other plant priorities. EG&G continues to have problems in getting waste samples off-site for analysis. A comprehensive strategy for the overall waste characterization program is still not in place. The supercompactor organization has not received proper management emphasis and resources to keep the program on schedule.

Performance Area: D.2 ENVIRONMENTAL PROTECTION (10%)

Adjectival Rating: Marginal



Finalization of the Groundwater Management Plan has been delayed once with DOE approval and is still several weeks late beyond the revised date. This plan forms a key basis for the overall environmental protection planning for Rocky Flats, particularly in view of the emphasis on groundwater in remedial activities and public concerns.

EG&G Clean Water Act Division staff escorted subcontractors hired to operate the terminal pond treatment systems, allowing pond treatment and discharge to continue during the period. EG&G continued to maintain its programmatic commitments during this time period. The safety deficiencies noted in the EPA inspection of the Rocky Flats sewage treatment plant, observed as having been incomplete in the previous CPAF, were completed during the quarter.

Completion of the Roadmaps and Five-Year Plan for waste management efforts was quite noteworthy as the majority of these documents were devoted to waste management issues/programs. EG&G planning staff worked many long hours to develop these documents. DOE Headquarters staff complimented Rocky Flats on both documents.

Performance Area: D.3 ENVIR. RESTORATION AND NEPA IMPLEMENTATION (10%)

Adjectival Rating: Marginal

 The management of the overall environmental restoration program has been acceptable, but at the minimum level. EG&G has consistently struggled to meet Interagency Agreement (IAG) milestones, and has often provided documents to DOE so late that no DOE review was possible. Creative solutions for IAG problems which focus on maintaining our commitments are generally lacking, deferring instead to requests for extensions and delays without quantified bases. Some successes have been achieved, particularly in NEPA support to the plant and development of community relations. However, these positive aspects are sufficiently offset by the overall environmental restoration performance that the performance area is best defined as marginal. 

Performance Area: E. SAFEGUARDS AND SECURITY (10%)

Adjectival Rating: Unsatisfactory

EG&G has not demonstrated management commitment/ability to develop a comprehensive and fully integrated Safeguards and Security Program. They have not shown initiative in recognizing the essential elements of a comprehensive and graded safeguards and security program. Issues have been noted and discussed concerning EG&G's ability to perform basic and accepted security practices. These include lock and key control, vulnerability analysis, conceptualization and justification of security upgrades, testing and maintenance of critical security systems, and performance testing. EG&G continues to view safeguards and security as a short-term project and not a continuing long-term program.

# memorandum

Rocky Flats Office

DATE: OCT 24 1991

REPLY TO  
ATTN OF: ERD:FRL:9119

SUBJECT: Plant Support to Environmental Restoration Activities

TO: J. O. Zane  
General Manager  
EG&G Rocky Flats, Inc.

The Rocky Flats Plant continues to make progress in addressing a broad range of issues. Foremost among these is the improved compliance with environmental laws and regulations brought about by continued efforts to develop and execute Federal Facilities Compliance Agreements (FFCAs). These FFCAs, once developed, require continued effort to ensure that individual commitments are met in support of Secretary Watkin's overall commitment to compliance.

One specific example which requires your attention is the current status of the Operable Unit 2 - Walnut Creek Interim Measure/Interim Remedial Action (IM/IRA). The second phase of this action under the Interagency Agreement (IAG) requires acquisition of a filtration unit to remove radionuclide and metal contamination from water by October 30, 1991. Delays in engineering support and procurement activities have caused an 11-month slip in the 15 month schedule for this activity, and we are currently attempting to resolve the dispute over the regulators' rejection of our requested schedule extension. By missing the milestone we are subject to stipulated penalties at the rate of \$10,000 per week if the dispute cannot be resolved. I believe that at least half of the 11-month slip was avoidable with proper priority from the engineering and purchasing organizations. I urge you to provide the emphasis to this activity so it can be completed as soon as possible.

More generally, the EG&G systems and priorities must be arranged so that similar events are precluded in the future, especially for IM/IRAs which by definition are needed for public protection from an imminent threat. A mechanism must be found so that reliable engineering support, unaffected by short-term priorities, is provided for acquisitions in support of environmental restoration activities. Similarly, it may be wise to review the overall acquisition cycle to determine whether unwarranted review steps are inhibiting the process.

I believe the actions described above are critical to support the DOE/RFO commitment to our FFCAs, and overall environmental compliance. Compliance with laws, regulations, and outside agency agreements must always be a top priority. We will support your efforts to resolve these concerns toward a sound and permanent solution.

Robert M. Nelson, Jr.  
Manager

cc:

L. Barrett, DP-2.1, DOE  
M. Bishop, DOE/RFO  
D. Simonson, DOE/RFO  
J. Kersh, EG&G/RF



# memorandum

Rocky Flats Office

DATE: APR 01 1992

REPLY TO  
ATTN OF: ERD:FRL:3845

SUBJECT: Procurement and Engineering Support Systems

TO: J. M. Kersh, Associate General Manager  
Environmental and Waste Management  
EG&G Rocky Flats, Inc.

Rocky Flats' problems with procurement and engineering support were the focus of the dispute for the radionuclides removal system for the Operable Unit 2 Interim Measure/Interim Remedial Action (IM/IRA). The dispute was resolved by EPA offer on October 31, 1991 and DOE acceptance on November 4, 1991 of settlement provisions. Although EPA and CDH granted a six-month schedule extension, a key provision of the dispute resolution was that "DOE/EG&G will concurrently pursue institution of changes in the procurement/engineering support procedures. These changes will facilitate completion of IM/IRAs...and help ensure compliance with all other IAG milestones."

Your letter (92-RF-0041), dated January 10, 1992, and working-level discussions indicate that little progress has been made in streamlining the procurement and engineering support activities. Please provide a status of progress to date in streamlining the support to environmental remediation activities. A flow diagram with timeframes for key activities of a sample procurement would be a useful part of the response. Since this is an issue of IAG compliance, a response by April 16, 1992 is requested.

Please contact Frazer Lockhart (x7846) or Rich Schassburger (x4888) of my Environmental Restoration Division for questions or clarification.

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James K. Hartman  
Acting Assistant Manager  
for Environmental Management

cc:

R. Lightner, EM-45  
R. Greenberg, EM-453  
A. Rampertaap, EM-453  
R. Schassburger, ERD, RFO  
E. Evered, EG&G  
P. Bunge, EG&G

ERD	AMEM
Lockhart:mak	Hartman
3/30/92	3/ /92

**ATTACHMENT**

**Memoranda Regarding RFEDS Issues Relating RFP IAG**

United States Government

Department of Energy

Rocky Flats Office

# Memorandum

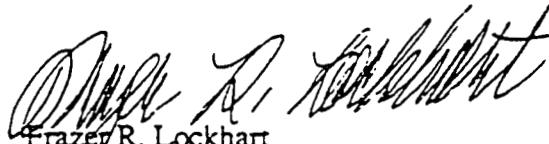
DATE: JUN 11 1991

REPLY TO  
ATTN OF: ERD:FRL:4626

SUBJECT: Modified Performance Evaluation Report , CY91 for EG&G

TO: Marshall L. Bishop, Assistant Manager for Administration

Attached is the modified Performance Evaluation Report input for EG&G from Environmental Restoration Division. This covers the period from April 1, 1991 to May 10, 1991. I am also providing separately a Macintosh disk to Terrel Agy with the PER information in Word 4.0 format. Please contact me at extension 7846 if there are questions.

  
Frazer R. Lockhart  
Director  
Environmental Restoration Division

Attachment

cc:  
D. Simonson, DOE/RFO  
R. Schassburger, DOE/RFO  
H. Rose, DOE/RFO  
T. Agy, DOE/RFO

## SECTION II ACHIEVEMENTS/DEFICIENCIES/OBSERVATIONS

### B.1 ES&H- ISSUE MANAGEMENT

#### Significant Achievements

None.

#### Notable Achievement

None.

#### Significant Deficiencies

None.

#### Notable Deficiencies

The resolution of how to handle field wastes and drill cuttings from the Environmental Restoration program continues to delay start of the characterization program. This issue was identified in mid-April and has still not been sufficiently reduced to procedure to allow the field work to proceed. Development and finalization of the remaining field SOP's is also lagging the requirement to have them for use.

#### Observations

1. Much progress has been made toward resolution of Tiger Team findings in the Environmental Management organization. However, many of these findings still lack submission of the closure packages to allow final review and ultimate closeout by the DOE. Final closure packages are needed to be able to "take credit" for completing the Tiger Team actions.

2. It has been identified that the intent for the old uranium chip roaster has changed since the original closure plans were completed. The latest plan, to utilize the chip roaster for non-hazardous material after remediation and "closure", is not consistent with the role of remediation programs. This area needs to be re-evaluated to see if the reuse plan is still sound and if so, to then address modifications to the plans and lead organization.

3. The RFEDS database continues to make progress, although six to nine months behind the original schedules. This database is a key component of a comprehensive environmental management program which has the ability to utilize its information and analyze trends. Issues of policy and management organization must be quickly resolved so the database can function to provide critical support to the characterization program in a timely manner.


RFEDS



# memorandum

DATE: JAN 29 1992  
REPLY TO  
ATTN OF: ERD:FRL:1096  
SUBJECT: EG&G Performance Evaluation Report, Period 92/1  
TO: Marshall Bishop, Assistant Manager for Administration

Attached is the Performance Evaluation Report input for EG&G from the Environmental Restoration Division. This covers the period from July 1, 1991 to December 31, 1991. I am also providing to Terrel Agy the PER information in Word 4.0 format on TOPS, as requested. Please contact me at extension 7846 if there are questions.

  
Frazer R. Lockhart  
Director  
Environmental Restoration Division

Attachment

cc w/Attachment:  
R. Greenberg, EM-453  
D. Simonson, AMEM, RFO  
R. Schassburger, ERD, RFO  
H. Rose, ERD, RFO  
T. Agy, AFAB

# PERFORMANCE EVALUATION REPORT

EG&G ROCKY FLATS, INC.  
CONTRACT NO. DE-AC04-90DP62349  
FOR THE PERIOD JULY 1 - DECEMBER 31, 1991

PERFORMANCE MONITOR: Frazer R. Lockhart  
AREAS EVALUATED: A.1, C.1, C.2, C.3, F

The following information represents my evaluation of EG&G for the months of July 1 - December 31, 1991. This represents the final evaluation for the 6-month evaluation period. The format used is based on Attachment 7 of the RFO Award Fee Internal Guide.

## SECTION I EXECUTIVE SUMMARY

### Performance Area: A.1 ES&H ISSUE MANAGEMENT

Suggested Adjectival Rating: Satisfactory

Issues involving the environmental restoration budgets have been successfully addressed during this evaluation period. The contractor has shown marked improvement in responsiveness to issues, in both accuracy and timeliness. Key events were defense of the FY92 budgets with DOE Headquarters, and defense of the FY93-97 budgets with audit teams from within DOE and outside DOE.

RFEDS [ Continuing problems with development of the Rocky Flats Environmental Data System (RFEDS) are a negative counter to the positive budgetary efforts. The RFEDS problems are a continuation of a deficiency from the last evaluation period, which has seen increased effort, but little substantive progress. ]

### Performance Area: C.1 WASTE MANAGEMENT PROGRAM

Suggested Adjectival Rating: Satisfactory

Although comments are limited to the Solar Ponds Cleanout, this effort has been successful during this evaluation period. EG&G has taken several key steps to solidify the contract for performance of the cleanout by the November 8, 1992 milestone. Although the planning effort has lagged the actual performance and the Program Plan requires updating, the overall effort has been positive.

### Performance Area: C.2 ENVIRONMENTAL PROTECTION

Suggested Adjectival Rating: Satisfactory

Comments are limited to the Groundwater Monitoring and Protection Plan. This plan was submitted to DOE after several extensions and extensive public comment. The final plan is acceptable, but still has significant flaws which will need to be addressed in future revisions.

## SECTION II ACHIEVEMENTS/DEFICIENCIES/OBSERVATIONS

### A.1 ES&H ISSUE MANAGEMENT

#### Significant Achievements

None.

#### Notable Achievement

1. Development of a spending plan for the FY92 budget was an extensive effort based on the uncertainty of funding. EG&G demonstrated an ability to develop reasonable funding scenarios, with complete and valid identification of impacts at the various funding levels. The EG&G effort, specifically the development of a variety of budget combinations between the various Operable Units, contributed significantly to resolution of the budget uncertainty and a final decision by DOE Headquarters.
2. The Independent Cost Estimate (ICE) review of the FY93 budget conducted by representatives from DOE Headquarters was a major undertaking. EG&G prepared very effectively for this review, allowing the review team to finish nearly a week ahead of schedule. The cooperative effort displayed by EG&G facilitated the review and added to an overall positive atmosphere. The review is considered to have been very successful, and especially notable because of the priority and lack of advance guidance from DOE Headquarters.
3. The FY93 budget review conducted by the Office of Management and Budget (OMB), assisted by the Corps of Engineers staff, was also very successful. EG&G aggressively managed the exchange of information to make it as effective as possible. The cooperative attitude and frankness of discussion was mirrored by the review team through fair consideration of Rocky Flats issues. The review was professionally conducted and successfully completed, with the OMB recommending a level of funding for Rocky Flats that was even above the original DOE Headquarters request to OMB.

#### Significant Deficiencies

None.

#### Notable Deficiencies

RFEDS

The RFEDS database continues to make slow progress, now twelve to fifteen months behind the original schedules. Problems persist with the conversion of the 'Weston' database, making much of the historical environmental data inaccessible. Acquisition of user-friendly modules and modeling capability are key features which are still unavailable. The RFEDS database is a key component of a comprehensive environmental management program which has the ability to utilize its information and analyze trends. The RFEDS system must be completely established and functional to provide a database which can provide badly needed support to the entire environmental program.

## SECTION III, PART B: FULL DISCUSSION OF CONTRACTOR'S PERFORMANCE IN EACH EVALUATION AREA

### A.1 ES&H ISSUE MANAGEMENT

EG&G has successfully addressed the major issues which evolved during this period from the environmental restoration perspective. These have primarily been related to budgets and cost reviews for the environmental restoration program. On very short notice, the DOE and EG&G were advised of budget reviews by an Independent Cost Estimating group from PR-20, followed by a similar review by the Office of Management and Budget (OMB) and Corps of Engineers. These reviews required a complete bottoms-up preparation of all aspects of the scope, schedule and budget for each operable unit for fiscal years 93 through 97. EG&G responded with a cooperative attitude and a sincere desire to clarify their program to the auditors. The effort consumed five weeks, not including preparation time, and resulted in a successful defense of the Rocky Flats budgets for FY 93. Most notable was the OMB review as it resulted in OMB 'validation' of a FY93 budget of over \$150M, when DOE Headquarters had only requested \$77M earlier in the year. Rocky Flats is the only site I am aware of that defended a higher requirement than had been requested.

RFEDS

One nagging issue has not received adequate attention, the development of the Rocky Flats Environmental Data System (RFEDS). This database has been under development since 1989, with schedule dates for completion in late 1990. Problems with system design and coordination with the Information Resources organization have caused multiple delays. The DOE has repeatedly expressed concern for the delays in both CPAF evaluations and direct correspondence. Although there appears to be a lot of work underway to address RFEDS, the substantive results are still unsatisfactory.



### C.1 WASTE MANAGEMENT PROGRAM

This evaluation is limited to the Solar Pond Cleanout. The overall performance evaluation should be based on input from the primary performance monitor. EG&G has made significant progress in executing the contract with Haliburton/NUS for the Solar Pond cleanout effort. Negotiations were difficult, hampered by changing scope and involvement of some DOE Headquarters personnel in the effort. EG&G has taken steps to assure the successful completion of Phase I and II of the program by November 8, 1992. While the action and support by the contracting organization has been good, the planning effort has lagged behind. Much has changed in the plan for the Solar Ponds, in both schedule and approach. The Program Plan needs to have modifications completed to place the program on a solid, approved basis. The Solar Pond Cleanout has been the subject of two GAO audits and will continue to receive intense scrutiny from within and outside the DOE. An approved Program Plan is the first step in assuring a consistent, effective program is executed.



United States Government

Department of Energy

Rocky Flats Office

# Memorandum

DATE: APR 22 1991

REPLY TO  
ATTN OF: ERD:SG:3042

SUBJECT: Rocky Flats Environmental Data System (RFEDS)

TO: David P. Simonson, Assistant Manager for Environmental Management

THROUGH: Frazer R. Lockhart, Director, Environmental Restoration Division

There are two issues affecting the Rocky Flats Environmental Data System (RFEDS) that need immediate resolution. These include EG&G policy transferring RFEDS from EG&G Environmental Monitoring and Assessment (Kersh) to Information Resources (IR); and streamlining procurement of RFEDS software and hardware.

## Issue One

EG&G has a new policy concerning Information Resources (Policy 7-21; April 9, 1991, attached) that will transfer the Rocky Flats Environmental Data System (RFEDS) from the Environmental Monitoring and Assessment Division (EMAD), under J. Kersh to Information Resources (IR). This is revealed by an EG&G memo to Kersh requesting transfer of the RFEDS staff under EMAD to IR (GEM-001-91; April 15, 1991, attached).

I see this as a significant concern to the environmental programs, particularly the Environmental Restoration (ER) program. Implementation of RFEDS was coordinated with ERD and defined in EG&G's implementation document, entitled "Rocky Flats Plant Environmental Data Management and Analysis: Computing Requirements and Plans for Implementation," approved by Kersh, April 26, 1990. RFEDS got off to a slow start due to infighting between various RFO groups concerning "ownership" of data base. Currently, the RFEDS implementation is at least six months behind due to "ownership" struggles within EG&G.

With ER field work scheduled to begin May 1991, it is imperative that RFEDS not fall into renewed "ownership" battles. Due to the importance of RFEDS to InterAgency Agreement deliverables and schedules, I consider it imperative that "ownership" and control remain in the hands of the users, EMAD. Otherwise, there could be several

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04/ /91

impacts to the ER program. Among numerous impacts to delay in RFEDS implementation and transfer of "ownership," these are the most important:

- 1) IAG schedules, RCRA environmental reporting, and EPA/CDH electronic data package deliverables may not be met because the "owner" of RFEDS would not be directly accountable for schedules and deliverables.
- 2) A poor understanding of site environmental conditions which would result in numerous side effects, including inadequate IAG deliverables (and resultant comments and "RFO-bashing" from the EPA/CDH).
- 3) The likely result of not adequately characterizing Operable Units resulting in, subsequent, additional Remedial Investigation Phases, delaying implementation of final remedial actions (and IAG schedule delays).

#### Issue Two

RFEDS implementation has been continuously delayed due to procurement/contracts "shortstopping." Although Information Resources has agreed (informally) to the RFEDS implementation plan, they appear to continually delay acquisition of RFEDS software and hardware. EMAD has been awaiting approval and acquisition of several workstations since November 1990, but the procurement has not been processed (RFEDS is currently set up on a single IBM computer terminal).

Agreement within DOE (AMEM and AMA) and within EG&G needs to be made concerning "ownership" and prompt processing of purchase requests for RFEDS as soon as possible.

If you have any questions, please feel free to contact Scott Grace at extension 7199.

Scott R. Grace,  
Physical Scientist  
Environmental Restoration Division

United States Government

Department of Energy

Rocky Flats Office

# Memorandum

DATE: MAR 29 1991

REPLY TO:  
ATTN OF: ERD:SG:2134

SUBJECT: Rocky Flats Environmental Data System (RFEDS)

TO: J.M. Kersh, Associate General Manager  
Environmental Restoration and Waste Management  
EG&G Rocky Flats, Inc.

DOE is concerned that the RFEDS system will not be sufficiently implemented to support the upcoming Inter-Agency Agreement characterization activities. We would like assurances that the RFEDS will capture characterization data such that it will be available to the various user modules. As a result, please provide discussions on the following information concerning RFEDS.

- (1) How RFEDS is going to incorporate the characterization data from remedial investigations that are scheduled to begin in May 1991.
- (2) In addition to the Dynamic Graphics ISM and IVM software, discuss what other software packages are currently being considered for the Geologic/Geographic Information System (G/GIS) portions of RFEDS.
- (3) The current schedule for availability of the "user-friendly" translators to the Oracle data base and G/GIS modules.
- (4) Status of the validation/verification process for the Weston Database III data.
- (5) Status of the data packages that have been given to EPA/CDH and the plan for providing future data packages as per our commitments to EPA/CDH.

Additionally, DOE expects EG&G to install and maintain RFEDS workstations in Building 116 for DOE staff. Therefore, please make arrangements for networking RFEDS workstations in Building 116 and training DOE staff in use of RFEDS.

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J.M. Kersh  
Page 2

Please respond to these items within three weeks of receipt. If you have any questions, please feel free to contact Scott Grace at extension 7199.

David P. Simonson  
Assistant Manager  
for Environmental Management

cc:

B. Lewis, DOE/RFO  
T. Olsen, DOE/RFO  
B. Birk, DOE/RFO  
B. Thatcher, DOE/RFO  
E. Evered, EG&G/RF  
T. Greengard, EG&G/RF  
M. Arndt, EG&G/RF